

# EXHIBIT 20

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**From:** Westenberger, Eric [ewestenberger@pattonboggs.com]  
**Sent:** Thursday, July 01, 2010 11:17 PM  
**To:** Daleo, Eric  
**Cc:** Yennock, Edward; sdonziger@donzigerandassociates.com; Tyrrell, James  
**Subject:** Re: Tomorrow's Production to Chevron

1. Gd's initial changed time schedule was based on pablo's speculative and unclear and non-specific statement to a reporter (and after umpteen years of litigation, who knows what "soon" means). Chevron asked the court to credit the statement based on nothing else, notwithstanding he entered a scheduling order. Now, the ecuador judge's statement should be second guessed because it does not guarantee that judgment is 8-10 months away. Thus, we should conclude it could be tomorrow. Bullshit. How did pablo's statements to the press become more authoritative than the judge's statements to the bit? How did chevron know what pablo was talking about or what the judge was talking about particularly? They cannot turn this on us.
2. We are not seeking to mess with the court's schedule. Chevron did that with their "emergency" filing based upon a lawyer's speculative statement in the press. The judge had previously spoken. Knowing the true info, he should go back to his original schedule--i stress his schedule.
3. The judge gave us a reasonable schedule. If not for chevron's tricks, hiding the ball,etc, we would be on the same reasonable track.
4. This all presupposes bad things in ecuador. No US court should take on the role of questioning a sovereign. Chevron should not be permitted to scare this court into thinking it can only "save the world".
5. Every court to consider these questions has taken a cautious look. "Judge Hegarty, respectfully, you are putting yourself out on the cutting edge for no good reason. Appellate courts are reviewing all of this with stays in place; take care. Privilege is at stake.
6. Perhaps we should oppose a schedule that gets all actions across jurisdictions on the same schedule.
7. We have seen these tricks before. Run us out of resources. Request emergency hearings. If due process is a concern, let's at least get it here in the US.
8. If chevron worked with us one iota, we may be able to solve some issues on our own; they don't. We just want fairness and due process.

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Sent from my BlackBerry Wireless Device

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**From:** Daleo, Eric  
**To:** Westenberger, Eric  
**Cc:** Yennock, Edward  
**Sent:** Thu Jul 01 23:13:38 2010  
**Subject:** Tomorrow's Production to Chevron

Eric,

Wanted to advise you that tomorrow's production to Chevron will be the leanest to date at **37 documents, 202 pages** (our first production was ~500 pages, our second at ~700 pages). Unfortunately, in the initial non-Bates numbered lot, we are coming to what appears to be the end of the road in terms of "publicly available" material to produce.

If you think this is unacceptably low, we can produce some documents we were trying to hold off producing that are non-privileged but potentially damaging.

-Eric

**Eric R. Daleo**  
*Associate*

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